

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA

NORMAN SPIEGEL, Derivatively On Behalf
of Nominal Defendant CHESAPEAKE
ENERGY CORPORATION,

Plaintiff,

v.

Civil Action No. 5:12-cv-00502-M

AUBREY K. MCCLENDON, RICHARD K.
DAVIDSON, KATHLEEN M.
EISBRENNER, V. BURNS HARGIS,
FRANK KEATING, CHARLES T.
MAXWELL, MERRILL A. MILLER, JR.,
DON NICKLES, and LOU SIMPSON,

Defendants,

- and -

CHESAPEAKE ENERGY CORPORATION,

Nominal Defendant.

JOINT MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT

WHEREAS, on May 3, 2012, plaintiff Norman Spiegel (“plaintiff”) filed his Verified Shareholder Derivative Complaint (“Complaint”) in the above-entitled matter;

WHEREAS, plaintiff is in the process of completing service of the Complaint on Nominal Defendant Chesapeake Energy Corporation and Individual Defendants Aubrey K. McClendon, Richard K. Davidson, Kathleen M. Eisbrenner, V. Burns Hargis, Frank Keating, Charles T. Maxwell, Merrill A. Miller, Jr., Don Nickles, and Lou Simpson (“defendants”);

WHEREAS, Federal Rule of Civil Procedure 12(a)(1)(A) provides that defendants must serve a responsive pleading within twenty-one (21) days after being served with the summons and complaint;

WHEREAS, a coordinated response date for all defendants would promote efficiency;

WHEREAS, the parties have agreed to confer regarding the filing of a consolidated complaint and/or the filing of a responsive pleading within fourteen (14) days after the Court grants or denies a motion to consolidate this action with actions related to this case; and

WHEREAS, counsel for the defendants has agreed to accept service of the Complaint on behalf of all of the defendants;

NOW THEREFORE, IT IS STIPULATED AND AGREED that the parties shall confer regarding the filing of a consolidated complaint and/or the filing of a responsive pleading within fourteen (14) days after the Court grants or denies a motion to consolidate this action with actions

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related to this case.

DATED: May 25, 2012

By: s/Daniel M. Delluomo
DANIEL M. DELLUOMO, OBA No. 11810
5617 N. Classen Blvd.
Oklahoma City, OK 73118
Telephone: 405-843-0400
Facsimile: 405-843-5005
Email: monty@delluomo.com

GLANCY BINKOW & GOLDBERG LLP
LIONEL Z. GLANCY
MICHAEL GOLDBERG
EX KANO S. SAMS II
1925 Century Park East, Suite 2100
Los Angeles, California 90067
Telephone: (310) 201-9150
Facsimile: (310) 201-9160
Email: lglancy@glancylaw.com
Email: mmgoldberg@glancylaw.com
Email: esams@glancylaw.com

Counsel for Plaintiff

ORRICK, HERRINGTON & SUTCLIFFE LLP
M. TODD SCOTT
The Orrick Building
405 Howard Street
San Francisco, California 94105-2669
Telephone: (415) 773-5700
Facsimile: (415) 773-5759
Email: tscott@orrick.com

*Counsel for Nominal Defendant Chesapeake
Energy Corporation and Individual Defendants
Aubrey K. McClendon, Richard K. Davidson,
Kathleen M. Eisbrenner, V. Burns Hargis, Frank
Keating, Charles T. Maxwell, Merrill A. Miller, Jr.,
Don Nickles, and Lou Simpson*

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